

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Norma D. Lane,

Plaintiff

vs.

Gabrielle Renoir-Large - see attached

Dana Delaney Matthews

A.K.A. David R. Ransbottom

Defendants

Case Number:

COMPLAINT

1. INTENTIONAL INFLICTION
OF EMOTIONAL DISTRESS
2. ASSAULT
3. SLANDER
4. LIBEL

JURY TRIAL DEMANDED

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Plaintiff Norma D. Lane alleges as follows:

INTRODUCTION

1. I, Norma D. Lane, resident of Fort Mill, SC since July 12, 2012, do hereby declare all of the following allegations in this complaint to be true and factual.
2. Prior to residence in York County SC, I resided in Charlotte, North Carolina for approximately twelve years, caring for my aging mother and working in Charlotte.
3. The Defendants in this case, Gabrielle Renoir-Large and Dana D. Matthews, have stalked and harassed me for years over the Internet and via telephone calls, even calling my work place and accusing me of stealing from my company.
4. On March 1, 2022, I was made aware of these accusations by several friends who were horrified and sent me screenshots of the accusation of my being accused of trying to murder Gabrielle Renoir-Larges ex-husband in a nursing home and accusing me of murdering my mother for money.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

PARTIES TO THIS COMPLAINT

A. PLAINTIFF

NORMA DARWIN LANE, Pro Se

1869 Northfield Lane
Fort Mill, SC 29708
704-514-2087
email: normasc2001@yahoo.com

B. DEFENDANTS

DANA DELANEY MATTHEWS

A.K.A. DAVID ROBERT RANSBOTTOM

5334 Refugee Road
Columbus, OH 43232
Phone: 614-863-2980

GABRIELLE RENOIR-LARGE

A.K.A.

Patricia Ann Jackson
GC Renoir
Camille Renoir
Gabrielle Renoir-Large
Gabrielle Serraglio
Gabrielle Aimee deLourdes
Gabrielle Aimee Francoise deLourdes
Gabrielle Schlotter Renoir
Oliver Orange
Patricia Ann Notestone

Gabrielle Cullen
Gabrielle Verhaeghe
Gabrielle Aimee Schlotter Renoir
Gabrielle Aimee Ransbottom
Mrs. Carl D. Ransbottom
Anna Carvalho-Mejia
AJ Mason
Orange Tangerine
Kathi
Regina Camilla
Kathi V

5334 Refugee Road
Columbus, OH 43232
Phone: 614-863-2980

IN THE UNITED STATES DISTRICT COURT
FOR SOUTH CAROLINA

NOW COMES Plaintiff Norma Darwin Lane, Pro Se, and alleges as follows:

PARTIES

1. Plaintiff Norma D. Lane (hereinafter "Plaintiff") is a resident of York County in the State of South Carolina.
2. Defendants: Gabrielle Renoir-Large and Dana Delaney Matthews (hereinafter "Defendants") are residents of the State of Ohio, County of Franklin.

JURISDICTION AND VENUE

3. This Court has jurisdiction over this action under 28 U.S.C. § 1332 because the amount in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs, and is between citizens of different states.
4. Venue is proper in this Court under 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the claims occurred in this judicial district.

STATEMENT OF FACTS

5. The above named Defendants are mother (Gabrielle) and son (Dana) who share a residence and phone numbers. In addition, they share home computers and websites. One such website (blog) is named The Johnny Mathis Appreciation Society.
6. In February 2022 this was a public blog and Defendants encouraged people on Facebook to read it.
7. Gabrielle Renoir-Large has admitted in court that she is the writer of this blog.
8. Thereafter, on March 1, 2022, Gabrielle Renoir-Large proceeded to libel the Plaintiff by posting untrue statements accusing the Plaintiff of attempting to murder the ex-husband Carl Ransbottom and also accused the Plaintiff of murdering her own mother for money.
9. The Plaintiff was contacted by several friends on Facebook as to these allegations.
10. Plaintiff does not visit that particular blog and has no desire to as some have claimed to have picked up viruses.
11. The Plaintiff's friends screenshot the public blog and sent to the Plaintiff. On March 10, 2022, the Plaintiff Gabrielle Renoir Large was sent a registered letter.
entitled "Intent To Sue". Letter stated The defamatory remarks by Defendant include the following: (but not limited to):
"Someone matching Lane's description actually made the trip from
Charlotte NC to Celina Ohio and paid an unwelcome visit to Mr. Ransbottom, with the intent to force him to sign the "dying declaration" at any cost. When he went into cardiac arrest an orderly ran to his room and found Lane hovering over him, forcing a pen into his hand. Lane had turned the oxygen off and was squeezing the IV tubes into a knot.

12. By making these false publications on The Johnny Mathis Appreciation blog, Defendant's sole purpose and motive was to embarrass and harm Plaintiff. Defendants falsely communicated to the public statements they knew to be untrue.

The Defendants have a long history of stalking and harassing others on the Internet.

One such victim was forced to obtain a restraining order against Gabrielle Renoir-Large in July of 2020.

On March 28, 2022 the Plaintiffs have now made the blog private but that does not mean that hundreds of people have not read the libelous blog.

There has been no public apology or retraction of the untrue and harmful statements made by the Defendants which harm the Plaintiff.

Plaintiff is a notary in the State of South Carolina and depends upon her good reputation and name.

**FIRST CAUSE OF ACTION
(Defamation)**

13. Plaintiff realleges and reavers all previous paragraphs as if fully stated herein.
14. The false communication made by the Defendants about Plaintiff was defamatory and defamatory *per se* as it accused Plaintiff of crimes of moral turpitude.
15. The false communications made by the Defendants concerned Plaintiff.
16. The false statements made by the Defendants about Plaintiff were published.
17. The false communications made by the Defendant about Plaintiff were published without any reasonable effort by the Defendants to first determine the truth or falsity of the defamatory allegations contained within the false communications.
18. Alternatively, the false communications made by the Defendants about Plaintiff were published by the Defendants with malice and actual knowledge that the defamatory allegations contained within the false publication were untrue.
19. The false statements made by the Defendants about Plaintiff are false and untrue.
20. As a direct and proximate result of the Defendant's acts and/or omissions as alleged herein, Plaintiff suffered injury and damages.

**SECOND CAUSE OF ACTION
(Negligence)**

21. Plaintiff realleges and reavers all previous paragraphs as if fully stated herein.
22. Defendants were negligent, grossly negligent, reckless, wanton, and/or careless in one or more of the following particulars.

- a. Failed to ascertain the truth of the false communication concerning Plaintiff prior to publishing same;
- b. Failed to attempt to ascertain the truth of the false publications concerning plaintiff prior to publishing same;
- c. In publishing the false communications concerning Plaintiff and
- d. In such other particulars as the evidence and discovery conducted in this matter will show.

23. As a direct and proximate result of the Defendant's acts and/or omissions as alleged herein, Plaintiff suffered injury and damages.

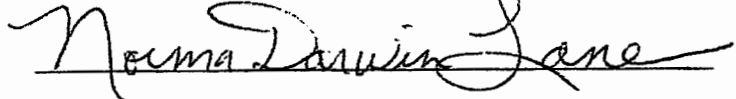
PUNITIVE DAMAGES

24. As a direct and proximate result of the reckless, wanton and/or willful acts and/or omissions of the Defendants as alleged herein, Plaintiff is further entitled to punitive damages.

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WHEREFORE, Plaintiff prays for judgment against the Defendants, for all damages she is lawfully entitled to, including but not limited to presumed, actual, compensatory and punitive damages that exceed the sum of seventy-five thousand dollars (\$75,000.00) as may be determined and awarded by a jury, and for such other and further relief as may be deemed appropriate by the jury and this Court including attorneys' fees and costs.

Respectfully submitted, Norma Darwin Lane, Pro Se

A handwritten signature in black ink that reads "Norma Darwin Lane". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

1869 Northfield Lane
Fort Mill, SC 29708

(t) 704-614-2087

email: normasc2001@yahoo.com

Trial by Jury Requested pursuant to FRCP 38

March 31, 2022